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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

DEBRA BLAKE, GLORIA JOHNSON,
JOHN LOGAN individuals, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

CITY OF GRANTS PASS,

Defendant.

Case No. 1:18-cv-01823-CL

**DECLARATION OF INESSA
WURSCHER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

I, **Inessa Wurscher**, declare as follows:

1. I am a staff attorney at the Oregon Law Center, Grants Pass office. My office represents the plaintiff class in this case.

1 DECLARATION OF INESSA WURSCHER IN SUPPORT OF PLAINTIFFS' MOTION
FOR SUMMARY JUDGMENT

2. The attached summary of trespass orders, dispatch data on trespass orders for class representatives, emails, incident reports and park exclusion order (all of which are cited to in plaintiffs' summary judgment brief) were produced by the City of Grants Pass in the course of discovery (Exhibit 1).

3. I have reviewed all of the citations and incident reports from 2012 to 2019 related to the ordinances GPMC 5.61.020 (the anti-sleeping ordinance), GPMC 5.61.030 (the anti-camping ordinance), and GPMC 6.46.090 that were produced to plaintiffs in this case.

4. In total, the City of Grants Pass has provided 615 citations and 541 incident reports.

5. Of the 615 produced citations, 313 were for illegal sleeping, 129 were for illegal camping in the park, and 182 were for illegal camping. This information has been tabulated in more detail below:

Year	Total # of Tickets	Total # of Sleeping Tickets	Total # of Camping in Parks Tickets	Total # of Camping Tickets	Individuals
2012	24	16	8	1	20
2013	74	27	30	20	48
2014	228	131	44	56	129
2015	80	65	1	14	45
2016	47	19	6	22	31
2017	99	35	18	48	63
2018	46	18	9	19	36
2019	17	2	13	2	15
Totals	615	313	129	182	N/A

6. Of the 541 total incident reports, 366 were officer initiated and 354 were the result of a patrol check. This information has been tabulated in more detail below:

Year	Total # of Incident Reports	Officer Initiated	Patrol Check
2012	18	12	7
2013	64	36	33
2014	181	133	129
2015	98	67	62
2016	43	29	29
2017	87	55	57
2018	39	26	27
2019	11	8	10
Totals	541	366	354

7. I have also reviewed the 59 park exclusion notices the City produced to plaintiffs. Of the 59 park exclusions, 42 of them were for camping or sleeping in the parks and Officer Dennis Burge issued 34 of the exclusions.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 15th day of January 2020.

s/ Inessa K. Wurscher
Inessa K. Wurscher